

# **EXHIBIT D**

**Kappler, David**

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**From:** Martin McMahon <mm@martinmcmahonlaw.com>  
**Sent:** Wednesday, February 7, 2018 9:42 AM  
**To:** Haefele, Robert  
**Subject:** EXTERNAL-Re: Ltr to Martin McMahon 20180206.pdf

Dear bob in response to ur recent letter I hav 2 questions 1st am I correct that the funds r located in switzerland? Second do u have any authority for the proposition that an atty in a us case has an affirmative obligation to track down or secure assets that his client owns overseas to satisfy a judgment entered in favor of a judgment creditor I look f o r ward to reading that case law and will respond accordingly I would think that u have to hire local counsek f ile a proceeding in Switzerland seeking that kind of relief and explain that wael secured a license etc I don't have that ki n d of expertise I await ur response Martin+

On Feb 6, 2018 4:12 PM, "Martin McMahon" <[mm@martinmcmahonlaw.com](mailto:mm@martinmcmahonlaw.com)> wrote:

Dear Bob:

I did call into the Treasury earlier today and learned that the license had been issued. However, I wanted to inform you that I have no experience in terms of using that license to secure payment of fees. I'm not challenging the fact that there was an order issued by the magistrate providing for those fee awards. My problem is that I have secured a number of licenses in the past, but I needed to secure them so that I could represent a specially designated terrorist.

I have a question because I thought the money is located in Switzerland, but maybe I'm wrong about that. In any case, I don't see why your firm cannot take over this collection measure at this stage and I assume that it will be a lot of work involving Swiss attorneys if that's where the money is. FYI, Swiss courts are not exactly thrilled about working with Americans on the alleged War on Terrorism. They receive a lot of applications, but not a lot of hard facts proving that Mr. X is a terrorist. FYI, I have not yet received the license, but when I do I will fax the original to you. But again I ask, what is the issue with you taking over the collection measure at this stage?

As you know, I have not billed you for the time my firm has spent to secure that license, and it would appear to me that there would substantial legal fees incurred for anyone who tries to collect on that judgment. So, please get back to me with your insights on the matter.

Martin

On Tue, Feb 6, 2018 at 3:56 PM, Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)> wrote:

Marty – Please see attached correspondence regarding your client, Wa'el Jelaidan, and the sanctions previously imposed on him.

Regards,

**Robert Haefele** | Attorney at Law | Motley Rice LLC  
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